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Advance Polybag (Nevada), Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNION PACIFIC RAILROAD COMPANY;

Plaintiff,

vs.

ADVANCE POLYBAG (NEVADA), INC.,

Defendant.

Case No. 2:17-cv-02077-RFB-NJK

**STIPULATION AND ~~PROPOSED~~
ORDER TO SCHEDULE DEPOSITION
OF JEFF FORD ON MAY 31, 2018**

(First Request for Ford Deposition)

Pursuant to LR 26-1 and Fed. R. Civ. P. 26(f), the parties, Union Pacific Railroad Company (“Union Pacific”) and Advance Polybag (Nevada), Inc. (“Advance Polybag”), respectfully submit the following Stipulation and proposed Order and jointly request that the Court approve the taking of the deposition of Jeff Ford on May 31, 2018.

Whereas, third party witness Jeff Ford (“Ford”) has extensive knowledge about the lease and the railroad tracks that are at issue in this matter;

Whereas, Mr. Ford has been subpoenaed to appear for his deposition on May 25, 2018;

Whereas, Mr. Ford’s attorney reached out to counsel for Advance Polybag to get an alternate date for Ford’s deposition;

Whereas, Counsel for Ford informed counsel for Advance Polybag that Mr. Ford has prearranged travel plans from May 25 through May 29, 2018;

Whereas, counsel for Advance Polybag and Union Pacific would like to accommodate Mr. Ford by moving his deposition to May 31, 2018;

Whereas, the current discovery cutoff is May 29, 2018;

Now therefore the Parties stipulate and agree that they are willing to take Mr. Ford's deposition on May 31, ~~2019~~²⁰¹⁸, if the Court approves this stipulation. This stipulation is limited solely to Mr. Ford's deposition. Advance Polybag and Union Pacific respectfully request that the Court approve this stipulation and issue an Order permitting Mr. Ford's deposition to take place on May 31, 2018.

LAMSON, DUGAN & MURRAY, LLP and
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ATTORNEYS FOR PLAINTIFF

1 **NO FURTHER EXTENSIONS WILL**
2 **BE GRANTED.**

IT IS SO ORDERED:

3 
4 UNITED STATES MAGISTRATE JUDGE

5 DATED: May 22, 2018
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